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BY ECF

January 18, 2021

Re: United States v. Pierre, 19 Cr. 783 (SHS)

Honorable Sidney H. Stein
United States District Judge
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007-1312

MEMO ENDORSED

Dear Judge Stein:

Together with my colleagues, I represent Rules Pierre in this matter, which is currently scheduled for trial beginning on March 1, 2021. I write on behalf of Mr. Pierre and the government to jointly respectfully request a one-week adjournment of the deadline for proposed jury charges, proposed voir dire, and motions in limine from January 19, 2021 to January 26, 2021. The government began producing 3500 on January 15, 2021 as directed, and we believe the requested adjournment will provide the parties additional time to engage in plea negotiations as well as to potentially narrow the scope of the parties' pre-trial filings and the relevant issues for trial.

We thank the Court for its consideration of this request.

Respectfully submitted,

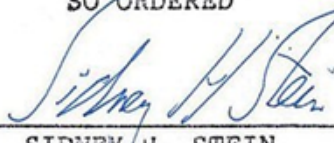
/s/ Brooke E. Cucinella

Brooke E. Cucinella

cc: Robert Boone, Esq./Jordan Estes, Esq. (by ECF)

Application granted.

**Dated: New York, New York
January 19, 2021**

SO ORDERED

SIDNEY H. STEIN
U.S.D.J.